

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE LOWER MANHATTAN
DISASTER SITE LITIGATION

21 MC102 (AKH)

NOTICE TO PRODUCE DOCUMENTS
PURSUANT TO FEDERAL RULE OF
CIVIL PROCEDURE 34

To: Hillman Environmental Group, LLC
c/o Salvatore J. Calabrese, Esq.
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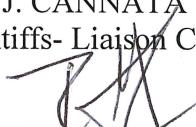
PLEASE TAKE NOTICE, pursuant to Rule 34 of the Federal Rules of Civil Procedure, Gregory J. Cannata & Associates, attorneys for plaintiffs in the above-captioned matter, requests the above referenced defendant to respond within thirty (30) days to the following demands for document production with reference to 1 Liberty Plaza, as referenced in the deposition of Christopher Hillmann, dated July 2, 2012, on or about each page listed below. To the extent records were already exchanged, please provide the bates numbers of the requested record(s) on Merril Lextranet.

1. Provide the site safety plan for the work at One Liberty Plaza which was created by Hillman Environmental, as referenced on or about page 226 in the above referenced deposition.

Plaintiffs reserve their rights to supplement this Notice and/or service additional Notices throughout the course of this litigation.

Dated: New York, New York
February 21, 2013

GREGORY J. CANNATA & ASSOCIATES
Plaintiffs- Liaison Counsel

By: 

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